

obtain and review documents in order to advise Defendant and to prepare an appropriate responsive pleading or motion. This has become more difficult as people are absent from the workplace and often unavailable during the current COVID-19 emergency.

3. On April 1, 2020, the undersigned counsel left a voicemail and sent an email to Plaintiffs' counsel to determine his position regarding the requested extension of time. As of the filing of this motion, the undersigned counsel has not received a response.

4. This is Defendant's first motion for an extension of the deadline to file a responsive pleading to the Amended Complaint.

5. This case is in its infancy. As such, granting this Motion will not result in undue delay or prejudice to the Court or any party.

WHEREFORE, Defendant Philadelphia Indemnity Insurance Company respectfully moves this Honorable Court for a thirty (30) day extension of time until May 7, 2020, to file a responsive pleading to Plaintiffs' Amended Complaint.

Respectfully submitted,

PHILADELPHIA INDEMNITY
INSURANCE COMPANY,

By /s/ Dana M. Horton

Dana M. Horton, Esq.
NH Bar ID: 266851
Robinson & Cole LLP
One Financial Plaza, Suite 1430
Providence, RI 02903
Tel. No.: (401) 709-3300
Fax No.: (401) 709-3399
E-mail: dhorton@rc.com

April 3, 2020

CERTIFICATION

I hereby certify that on the 3rd day of April, 2020, I have caused the within motion to be filed with the Court via the ECF filing system. As such, this document will be electronically sent to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent those not receiving electronic notice.

/s/ Dana M. Horton
Dana M. Horton, Esq.